

Philip Morris U.S.A.
Guide to Document Classification at the Research & Development Department
Tier 1

Philip Morris USA BUSINESS Documents	Philip Morris USA CONFIDENTIAL Documents	Philip Morris USA RESTRICTED Documents
<p>This classification covers those documents produced at R&D that are general in nature and do not disclose the operation or research of the Department or Company. There would be no threat to Philip Morris if these documents were to end up in the hands of non-Philip Morris employees. Generally BUSINESS documents will be classified A2152, although a case might be made for the use of other codes on the Philip Morris USA Records Management scheme. However, no documents coded P2621 or P2622 can ever be classified as BUSINESS. No BUSINESS documents are submitted to either Central File for permanent retention.</p> <p>Examples: Meeting notices that do not contain descriptive agendas, ERA announcements, general training notices or lists.</p>	<p>This classification covers the majority of the documents produced at R&D. CONFIDENTIAL documents represent information about our business or technology that we would not want to see in the hands of non-Philip Morris employees. Any of the document category codes on the Philip Morris USA Records Management scheme may be classified CONFIDENTIAL. Those coded P2622 are required to be sent to the Primary Central File for permanent retention. Once they have been through initial distribution by the originator and passed on to the Primary Central File, they are under Primary Central File's control and may be reproduced only by Primary Central File staff. In other words, CONFIDENTIAL documents may be shared with any Philip Morris employees who need to know the information contained in them; i.e., the initial distribution list is drawn up at the discretion of the author of the document. Primary Central File must appear on the distribution list of P2622 documents and assumes control for subsequent distribution. This does not preclude the sharing of information but rather the reproduction of the actual document and allows R&D to maintain a complete history of who has received which documents.</p> <p>Examples: Memoranda, correspondence, periodic project reports, formal internal reports dealing with the business of R&D; telephone lists and other lists containing personnel names.</p>	<p>This classification covers documents that cannot be shared beyond original distribution without express permission of management. RESTRICTED documents represent not only information that we would not want to see in the hands of non-Philip Morris employees but also information that should not be readily shared throughout R&D or the Company without approval from the originator's Director or Vice President. Generally, only documents categorized P2622 (technical) will have a classification of RESTRICTED, and these documents must be sent to the Primary Central File for permanent retention. Once they have been through initial distribution by the originator and passed on to the Primary Central File, they are under the Primary Central File's control and may be reproduced only by the Primary Central File staff. Note that proof of receipt is required for a RESTRICTED document that is not hand-delivered by the author or by Primary Central File staff.</p> <p>Examples: Memoranda, correspondence, formal internal reports dealing with the business of R&D that should not have a wide audience at the time they are written.</p>

Document Classification	Generation	Labeling	Distribution	Transmitting Hard Copy	Reproduction	Transmitting Via Fax/Email	Storage	Disposal
Philip Morris USA BUSINESS	All drafts should be destroyed, in keeping with good file and record keeping practices	Philip Morris USA Business must be printed on the top of each page of the document	May be forwarded to any employee	May be sent through U.S. or inter-office mail	May be reproduced by and for any employee	May be sent by fax or electronically to any employee	Need not be put away after hours or locked up; not retained by either Central File	May be destroyed in trash; need not be shredded and need not be sent to either Central File
Philip Morris USA CONFIDENTIAL	All drafts, regardless of medium, must be managed in accordance with official records retention policies	Philip Morris USA Confidential must be stamped on each document or printed on the top of each page produced by word processing, and a transmittal sheet must accompany the document (DOC CODE P2622) to the Primary Central File	May be shared with employees on a need-to-know basis, but may not be reproduced following initial distribution by originator (DOC CODE P2622)	May be sent through U.S. or inter-office mail; must be sent in an envelope or folded and stapled to hide contents and classification	Following original distribution, may be reproduced only by the Primary Central File personnel (DOC CODE P2622)	May be sent via fax or email for initial distribution; following original distribution, may be sent via fax only by Primary Central File personnel and to employees with a need-to-know reason for having document (DOC CODE P2622)	Unless in a locked office, must be stored in a locked desk or cabinet; must not be left out on a desktop or in mailbox or in/out basket after hours or be visible on a computer screen; retained permanently by the Primary Central File for business reasons (DOC CODE P2622)	Must be shredded when disposal is permissible, unless copy was received through the Primary Central File (in which case it must be returned to the Primary Central File); the making of notes on a document creates a new record that must be submitted to the Primary Central File
Philip Morris USA RESTRICTED	All drafts regardless of medium must be managed in accordance with official records retention policies	Philip Morris USA Restricted must be stamped on each document or printed on the top of each page produced by word processing, and a transmittal sheet must accompany the document (DOC CODE P2622) to the Primary Central File	May be distributed only to those on original list unless permission is granted by originator's Director or Vice President to obtain a copy through the Primary Central File (DOC CODE P2622)	May be sent through U.S. or inter-office mail in dual security envelope, marked on inside to be opened only by addressee or designee; RSVP (proof of receipt) is required, unless hand-delivered by the author or Primary Central File	Following original distribution, may be reproduced only by the Primary Central File and with the express permission of the originator's Director or Vice President (DOC CODE P2622)	May be sent via fax (following original distribution), only by the Primary Central File (DOC CODE P2622) and only to employees approved by the originator's Director or Vice President; RSVP (proof of receipt) is required; email distribution is never permitted	Must be kept in locked desk, cabinet, or office or on a secure electronic device (computer); retained permanently by the Primary Central File for business reasons (DOC CODE P2622)	Must be shredded when disposal is permissible, unless copy was received through the Primary Central File (in which case it must be returned to the Primary Central File); the making of notes on a document creates a new record that must be submitted to the Primary Central File

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Philip Morris USA PRIORITY Documents	Philip Morris USA TRADE SECRET Documents
<p>This classification covers documents that have a "for-your-eyes-only" status. PRIORITY documents represent information that we would not want to see either in the hands of non-Philip Morris employees or widely distributed throughout R&D or the Company because it would compromise our technology or business positions or be misunderstood as to intent or content and potentially damage the reputation of Philip Morris. Generally, only documents categorized P0622 will have a classification of PRIORITY, meaning that it is the technology or business position that is being protected. Administrative documents attached to PRIORITY projects should be classified CONFIDENTIAL or RESTRICTED and coded in keeping with the Philip Morris USA Records Management scheme. PRIORITY documents are sent to the Primary Central File for permanent retention. Laboratory notebooks containing such material must be microfilmed when completed, in keeping with the normal scheme. These documents will not be distributed without the approval of the appropriate Director or Vice President. These documents should not be transmitted by fax unless encrypted machines are available to both the sender and recipient. Proof of receipt (either from fax or mail) is required, unless the document is hand-delivered by the author or Primary Central File.</p> <p>Examples: Special project records as designated by the Directors or Vice Presidents</p>	<p>This classification is designated by the Senior Vice President of R&D. It refers to documents which pertain to technology under development that the Senior Vice President has reason to believe is critical to the future of R&D and the Company. Release of such documents could result in a loss of competitive advantage through premature disclosure of the direction of our technical endeavors or patentable projects. Certain projects are designated TRADE SECRET from their inception. The TRADE SECRET classification can also apply to developments tangential to TRADE SECRET or other ongoing projects. Once so classified, documents related to the projects, or trade secret portions thereof, should be treated alike. Only documents categorized P0622 will have a classification of TRADE SECRET, meaning that it is the technology or business position that is being protected, with the exception of strategic plans and select marketing plans. Administrative documents attached to TRADE SECRET projects should be classified PRIORITY or RESTRICTED and coded in keeping with the Philip Morris USA Records Management scheme. TRADE SECRET documents must be delivered to the Trade Secret Central File for permanent retention or until declassified. Laboratory notebooks containing such material must be microfilmed when completed, in keeping with the normal scheme. Electronic working copies of TRADE SECRET documents must be stored behind a firewall. These documents should not be transmitted by fax unless encrypted machines are available to both the sender and recipient. TRADE SECRET documents cannot be sent through the U.S. or inter-office mail.</p> <p>Examples: You will know if you are working on a TRADE SECRET project. (Note: Cigarette formulations are not sent to the Trade Secret Central File.)</p>

Document Classification	Generation	Labeling	Distribution	Transmitting Hard Copy	Reproduction	Transmitting Via Fax/E-mail	Storage	Disposal
Philip Morris USA PRIORITY	All drafts regardless of medium must be managed in accordance with official records retention policies	Philip Morris USA Priority must be stamped on each document or printed on the top of each page produced by word processing and a transmittal sheet must be attached to documents (DOC CODE P0622) submitted to the Primary Central File	May be distributed only to those on original list unless permission is granted by originator's Director or Vice President to obtain a copy through the Primary Central File	May be sent through U.S. or inter-office mail in dual security envelope, marked on inside to be opened only by addressee; RSVP (proof of receipt) is required, unless the document is hand-delivered by the author or Primary Central File	Following original distribution, may be reproduced only by the Primary Central File with the express permission of the originator's Director or Vice President	May be sent by encrypted fax (following original distribution) only by the Primary Central File personnel and only to employees approved by the originator's Director or Vice President; RSVP (proof of receipt) is required; email distribution is never permitted	Must be kept in locked desk, cabinet, or office or on secure electronic device (computer); submitted to the Primary Central File for retention (DOC CODE P0622)	Must be shredded on a machine designated for high security shredding when disposal is permissible, unless copy was received through the Primary Central File (in which case it must be returned to the Primary Central File); the making of notes on a document creates a new record that must be submitted to the Primary Central File
Philip Morris USA TRADE SECRET as designated by the Sr Vice President of R&D	Electronic working copies must be stored behind a firewall; all drafts regardless of medium must be managed in accordance with official records retention policies	Philip Morris USA Trade Secret must be stamped on each document (DOC CODE P0622) or printed on the top of each page produced by word processing and a transmittal sheet must be attached to documents submitted (hand-delivered) to the Trade Secret Central File	May be distributed only to those on original list unless permission is granted by the Vice President of Research to obtain a copy through the Trade Secret Central File	Must be hand carried, using dual security envelope; must not be sent through U.S. or inter-office mail	Following original distribution, may be reproduced only by the Trade Secret Central File with permission of the Vice President of Research	May be sent by encrypted fax (following original distribution) only by the Trade Secret Central File with permission of the Vice President of Research; RSVP (proof of receipt) is required; email distribution is never permitted	Must be kept in locked office, desk, cabinet, or safe, on secure electronic device (behind a firewall), or as designated by the Sr Vice President of R&D; submitted to the Trade Secret Central File for retention (with the exception of laboratory notebooks which are microfilmed by the Primary Central File)	Must be shredded on a machine designated for high security shredding when disposal is permissible, unless copy was received through the Trade Secret Central File (in which case it must be returned to the Trade Secret Central File); the making of notes on a document creates a new record that must be submitted to the Trade Secret Central File

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Responsibility for document classification resides with the generator, in consultation with local management, who must ensure that documents are classified according to the business and security needs of R&D. The exception is the TRADE SECRET classification, which is administered solely by the Sr. Vice President of R&D. Reclassification of documents must be approved by the local director and communicated to the Primary Central File or the Trade Secret Central File. The author of a TRADE SECRET document will be notified when it has been declassified and transferred to the Primary Central File.

Documents may be **reclassified** if business needs warrant it. While this predominantly indicates a lowering of the classification level, it is conceivable that circumstances may warrant a higher classification of some documents. If documents are reclassified by general subject or by project, a memorandum stating the new classification should be sent by the particular director or vice president involved to the R&D records management manager. These documents will not be re-microfilmed or re-scanned, showing their new classification. However, when they are reproduced in paper form in response to client requests, they will be stamped **RECLASSIFIED ON** <date> and then stamped with the new classification.

Although they are CONFIDENTIAL documents, personnel records are not subject to control by either Central File and are not bound by this scheme. Please deal with personnel records according to good management and business practice.

Note that the Primary Central File collects and stores all suspended documents regardless of the code assigned to them.